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ORIGINAL



EX PARTE

February 2, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

EX PARTE OR LATE FILED

RECEIVED
FEB 02 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-170, Truth-in-Billing and Billing Format

Dear Ms. Salas:

In response to the Commission's First Report and Order, released May 11, 1999, the Message Process Committee of the industry's Ordering and Billing Forum (OBF) has been exploring ways to comply with the requirement to identify and highlight "new service providers" on the end user bills.

A copy of the current OBF Issue Identification Form dealing with this issue is attached. The Message Process Committee has reached consensus (i.e., initial closure) on the creation of a new Truth-in-Billing module for April 1, 2000 compliance with the current regulations. The Committee expects to bring this issue to final closure when the OBF meets on February 7, 2000.

As noted in the attached OBF documentation, the Truth-in-Billing module is viewed as a technical solution that may require modification after the Commission rules on the pending petitions for reconsideration/clarification.

Please call me if you have any questions regarding this filing. Please include a copy of this correspondence in the public record of the above-captioned proceeding.

Sincerely,

Marie Breslin

Attachment

cc: G. Reynolds
A. Cheng

File of Original rec'd OF 1
ENCLOSURE

Ordering and Billing Forum Issue Identification Form

Exhibit 3B

OBF Issue Number	1977
Date Submitted	7/19/99
Date Accepted	8/9/99 at OBF #67
Initial Closure	12/13/99 on Interim CC
Final Closure	at OBF #
Issue Category	Active

Document Name(s): _____

Industry Segment: _____

Part A, Page 1

Issue Title: Truth-in-Billing New Service Provider Notification

Issue Statement/Business Need: The FCC mandated Truth-in-Billing order requires that new service providers be identified/highlighted on the end-user bill. A new service provider is defined as having not provided service to the end-user for the past *x* (i.e., 6) months (the time frame is currently being addressed via waivers).

The FCC Truth-in-Billing order compliance date is currently 9/5/1999.

Impact of Other Issues or Procedures: Any Type of Service

Desired Results: Establish a new method that identifies to the billing EC that the service provider identified on the record requires identification as a new service provider on the end-user bill.

Committee Assignment: Message Processing Committee

Associated Committee:

Issue Champion(s): Chris Read

Company Name: SWBT

Address: Dallas TX

Telephone Number: (214)464-2163

Email:

Company Name:

Address:

Telephone Number:

Email:

Resolution:

The committee reached consensus on the creation of a new Truth-In-Billing module, 020A for a New Service Provider with the following values:

- 1 – new pre-subscribed provider

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Part A, Page 2

Issue Title: Truth-in-Billing New Service Provider Notification

Resolution (continued):

- 2 – new non-pre-subscribed provider
- 3 – new unspecified provider

Disclaimer:

- * This solution represents our best attempts at finding a technical resolution to meet Truth-In-Billing New Service Provider requirements at an interim level. There are many open issues still to be addressed which may require additional Issues to be opened. The industry will seek additional guidelines in satisfying the Truth-In-Billing Service Provider requirements.

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Part B, Page 1

Issue Title: Truth-in-Billing New Service Provider Notification

Status History:

OBF #67

- ♦ The Issue was submitted by Mr. Chris Read, SWB, as part of the OBF #67 Agenda Package. Mr. Read reviewed the Issue Statement and Desired Results.
- ♦ It is unknown exactly "when" the FCC order on "Truth in Billing" will take effect, however, it could be as early as 9/5/99.
- ♦ Because a new "record", may not be needed, the word "record" was changed to "method" in the Desired results.
- ♦ The Issue was accepted by the Full Committee.
- ♦ The Issue Champion commented that a 39-10-05 would be proposed since a 39-10-04 was just created by another issue.
- ♦ Terri Bell, GTE, suggested looking at another method other than an entirely new record.
- ♦ The Issue Champion reviewed the provided documentation (See attached).
- ♦ Much discussion occurred about whether a 39-10-XX could be tied to the correct toll usage. What about the situation of unbillables? How would the 39 records be tied to toll usage in an unbillables & reject situation, when traffic is recycled and re-sent to carriers.?
- ♦ Record Layouts were reviewed and clarified with the committee.
- ♦ The Issue Champion suggested an Interim Conference Call (October 7 @ 11:00 am EST) to discuss this issue further.
- ♦ An **Action Item** was assigned for committee members to evaluate the proposed resolution and records and provide alternatives to the Issue Champion and Administrator prior to the Issue conference call.
- ♦ Gary Lawyer, McLeod USA, suggested an alternative that would have no record exchange impacts: Have the Local Service Providers responsible for tracking the information in a database.
- ♦ Issue will be further discussed on the 10/7/99 Conference Call.

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Issue Title: Truth-in-Billing New Service Provider Notification

FULL COMMITTEE INTERIM CONFERENCE CALL, OCTOBER 7, 1999

- ♦ As the issue was introduced based on a FCC order, Mr. Read asked participants if there were any other interpretations of the order. None were raised. Ms. Mancini, AT&T, had notified Mr. Read that the FCC has delayed the compliance date to April 1, 2000 with an effective date of 30 days after publication of notice due to Y2K. Ms. Grable, BellSouth, noted that a waiver has been filed by USTA, which has not been responded to yet. Mr. Read stated that the committee needs to move ahead and develop a method that can be used by the industry to meet the FCC order.
- ♦ Ms. Irwin, AT&T stated that the proposed record layout submitted by Southwestern Bell only addresses casual use yet the FCC order doesn't state that casual use is included. AT&T thinks that if the FCC excludes casual use then this requirement becomes a non-issue. Several companies disagreed with AT&T.
- ♦ Ms. Bell, GTE suggested that adding a new field or new values to an existing field could be a better alternative than a new record. "Type of Regulation" was offered as a possibility.
- ♦ Ms. Cockrell, Billing Concepts pointed out that the proposed values for "Type of Service Provider" are similar to existing values for
- ♦ Indicator 21. As for the "Date of New Service", a clearinghouse doesn't know the date service was provisioned, so would be unable to provide that information.
- ♦ Mr. Read advised that Southwestern Bell would use the "Date of New Service" for bill display purposes. Additionally, the 39 record would only be sent if a billable message was sent too.
- ♦ Ms. Cole, McLeod USA thinks multiple 39 records could be needed, i.e., 1+, operator services, etc.
- ♦ Much discussion took place about what happens if the 39 and/or the billable message reject. This cannot be addressed until it is known how the record will be

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Issue Title: Truth-in-Billing New Service Provider Notification

FULL COMMITTEE INTERIM CONFERENCE CALL, OCTOBER 7, 1999 (continued)

used. A process may be needed to return the 39 record if no billable records are successfully processed.

- ◆ The Sub-CIC Module also needs to be looked at.
- ◆ Ms. Trip, Billing Concepts questioned why the LECs are not keeping track of the new service provider information. Ms. Bell, GTE responded that the FCC order says that the Service Provider has the responsibility to provide this information to the LEC.
- ◆ Tracking this information on behalf of another company could be a revenue opportunity.
- ◆ McLeod USA would like for the billing company to track the information. If McLeod is to do the tracking, a lot of development work will be required therefore any solution will cause pain.
- ◆ Mr. Read pointed out that the FCC would like an industry solution. Whether you use the 39 record, a module or negotiate something else, there is still a need for an industry guideline.
 - ◆ Southwestern Bell views the 39 record as the best solution because it keeps the Service Provider information separate from the billable record, reducing the chances of the message failing edits and erroring or rejecting.
 - ◆ Sprint finds it easier to implement a new record.
 - ◆ GTE said it is easier to respond to new field or value versus a new record.
 - ◆ US West doesn't like either approach, but doesn't have a better one. Decided that the new record idea was a better approach after further discussion.
 - ◆ Billing Concepts is concerned about doubling the cost by sending two records instead of one. US West pointed out that we should be doing the right thing, not what is best based on cost.

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Issue Title: Truth-in-Billing New Service Provider Notification

FULL COMMITTEE INTERIM CONFERENCE CALL, OCTOBER 7, 1999 (continued)

- ♦ Much discussion took place around how many times the Service Provider would have to notify the LEC if a new field or value was used. Since the Service Provider will not know when the LEC bill periods are, they could only populate the field the first time they are billing the customer in the past 30 days. If the 39 record were used, it would not be created unless a billable message already existed.
 - ♦ The focus then shifted to Invoice Billing. AT&T said they will handle notification in an invoice billing environment. BellSouth stated that the 39 record could be sent in addition to the invoice. AT&T did not support that suggestion. Southwestern Bell felt that most usage affected by the FCC order would be non-invoice billed, however, they do not want to exclude invoice billing. **The committee agreed that Issue #1977 is for all new service providers, but it is understood that invoice billing contracts, containing language for New Service Provider, would preclude the need for the implementation of the resolution of this issue.**
 - ♦ **An Action Item was established for companies to investigate and determine which of the following three options is preferred:**
 - 1. new record**
 - 2. new field or modify existing field**
 - 3. develop new module**
 - ♦ When determining your preference, assume that the notification will take place on the first occurrence.
 - ♦ The issue champion requested that responses be provided by the agenda cut off which is October 25 so that the issue can move forward at OBF #68.
-

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Issue Title: Truth-in-Billing New Service Provider Notification

OBF #68

- ♦ Mr. Read, Issue Champion, explained the 3 options identified on the October 7 full committee conference call:
 - ♦ Create a new record
 - ♦ Add a new field or a new value to an existing field
 - ♦ Develop a new module
 - ♦ Mr. Read reviewed the responses submitted with the agenda posting:
 - Ameritech – new record
 - USP&C – new indicator or new value for Indicator 21
 - Billing Concepts – new record
- Additional comments voiced during the discussion were:
- AT&T - module
 - Bell Atlantic – module
 - US West – new record
 - MCI – new record
 - WinStar – something on an existing record
 - GTE - module
- ♦ Concerns were raised about impacts if notification records reject, the many interpretations of the FCC order, and the short timeframe to develop and implement a solution. Additional concerns related to Truth in Billing may require the formation of a sub-committee or task force.
 - ♦ AT&T expressed the concern of having to send two records for each billable record. This view is not shared by all participants.
 - ♦ Mr. Read walked the committee through the proposed Record Layout and Field Descriptions. The original proposed Record ID was 39-10-04, which had been assigned. The Record ID has been changed to 39-10-05.
 - ♦ **The committee agreed that a single notification method will be developed to meet the FCC order 98-170 (Truth in Billing).**
-

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Issue Title: Truth-in-Billing New Service Provider Notification

OBF #68 (continued)

- ♦ The committee agreed to table discussion until the full committee interim conference call scheduled for December 13, 1999 from 1:00 PM to 3:00 PM EST. Mr. Dan Goglio agreed to host the call. Conference call details will be forwarded to the Message Processing Committee Administrator for posting to the web site.
- ♦ **An Action Item (#22) was assigned for the committee to be prepared to address the following items:**
 1. **Consider the 39-10-05 record as the proposed solution. If this is not viable for your company, a well defined alternative needs to be presented for committee review on the call. Only one solution will be developed.**
 2. **Determine if the "Type of Service Provider" field is needed, and if yes, are there additional values required. Mr. Read will clarify the definition of value "0".**
 3. **Identify any packing impacts resulting from packing the 39-10-05 with Category 01 records.**
- ♦ The FCC has ordered a 4/1/00 implementation date. The committee will make best efforts to meet that date.

12/13/99 Full Committee Interim Conference Call

- Mr. Read noted that the solution that he provided for the FCC order for Truth-in-Billing New Service Provider is not an answer to everything in truth-in-billing, but is a piece.
- The proposed solution of a new record was reviewed. Mr. Read noted that a new record is the best solution for SWB. Mr. Read requested that this Issue be placed into Initial Closure on this conference call so that the industry may have something to work with by April 2000. The industry will need a quick implementation.
- Mr. Read clarified that the new record would be sent with the first billing record for a new end user of a new subscriber for a carrier. This would be the only time this record would be sent.

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Issue Title: Truth-in-Billing New Service Provider Notification

12/13/99 Full Committee Interim Conference Call (continued)

- Mr. Darcy asked whether there is any response on a time frame and what "new" means. Mr. Read replied that the order states the meaning of "new". It was agreed that this may be interpreted differently by various companies.
- An alternate proposal was jointly submitted by MCI WorldCom, AT&T, BIC, USP&C and OAN this morning prior to this conference call for committee review (1977a5v1.doc). This is a proposed module alternative to the 39-10-05 module. As per Mr. Grady, it appears that several companies, are in support of a module, instead of a separate record, solution.
- 4. It was agreed to discuss the Action Items assigned to the committee at OBF #68.

Open discussion/comments noted:

- Mr. Darcy noted that he did not see any definitions for any carriers in the order and asked what the purpose of this new record would be. What are the guidelines being used? Mr. Read replied that this new record would be used for any carrier providing new service to an end user. This record would not be limited to IC.
- Mr. Darcy asked how companies would know LEC bill cycles in order to send these records with the correct timing? Companies wouldn't know when to send or use this record. Ms. Bell commented that Mr. Darcy's concern would be an implementation issue. Mr. Darcy disagreed.
- Ms. Cockrell noted that, in her review of the document, it was unclear on a timeframe. Mr. Darcy noted that the document notes a thirty day interval. Mr. Darcy commented that a sixty day interval may work.
- Ms. Cowart asked how companies would know which carrier to notify. Ms. Bell commented that this would be something the carriers need to work out with the billing company. Mr. Darcy disagreed with local negotiations.
- A participant expressed concern that the FCC was not fully aware of the measures that would need to be taken in compliance with this order. Mr. Darcy has heard that this may just be for PIC type usage. Ms. Sue Shea, Bell Atlantic, commented that the order does not

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12/13/99 Full Committee Interim Conference Call (continued)

- state that as of today, thus, the industry cannot wait until this is known for a fact. Ms. Bell agreed; we need to start somewhere and this is a good start.
- Mr. Darcy would not want to go forward with this solution without all the facts. Ms. Bell commented that this is one means to provide a consistent manner in which companies can use; companies can develop their own negotiations. The industry does not have to use it and all companies do not have to abide by it.
 - Mr. Darcy noted that he would be more comfortable with this solution if it was a sixty day interval as opposed to thirty days. Ms. Bell noted that the order does not state a timeframe. Mr. Darcy noted that there is no way that a sending carrier can fulfill what Mr. Read is requesting. Mr. Read explained that it must be a new service provider; Mr. Read agrees that a six month interval would be better, but this is not yet available.
 - Much discussion occurred regarding who would be responsible for keeping track of this information.
 - Ms. Becky Mitchell, U S West, asked Mr. Darcy if he would want the exchange carriers to keep track of all this. Mr. Darcy stated that, unless we have more concrete information, we cannot come up with a solution for this Issue. Mr. Read noted that this is all the information the FCC will provide.
 - Mr. Read advised that this is a new process that a company will have to build in their system because he does not believe that any company can do it today. Mr. Read agrees that we have to start with something and this is a good start. Perhaps, the FCC may provide us with more clarification once they see that we are trying to work this Issue but cannot because we need more information from them.
 - Ms. Bell commented that timing does not have any impact on the new record. Mr. Darcy disagreed. Mr. Darcy is concerned with timing and the responsible parties.
 - Ms. Kelly Cole, McLeod, agreed with Mr. Darcy. If the order extends this out to 6 months, companies will not have an overlap of when to send the record. If a number is reassigned, companies will not know when to send a record. Companies do not have the end user

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12/13/99 Full Committee Interim Conference Call (continued)

customer billing information and therefore, do not know what has happened to that number. Ms. Cole advised that she was commenting from an operator services perspective.

- Ms. Bell noted that companies may obtain the information they need from local billing companies. There is no standard means that carriers have to use to get the information. Mr. Darcy commented that this should be part of the resolution.
- Mr. Darcy noted that if it is discovered that the new record would need to be used for Local Carrier PIC notification, then this new record would be useless. We would be creating a new record for nothing; the record is not designed for general traffic. Mr. Read noted that the FCC document is pretty clear that they are talking about both PIC (Subscribed) new service notification, and unsubscribed service notification.
- Mr. Darcy suggested sending a letter to the FCC advising that we need more information in order to move forward with a resolution. Mr. Joe Smith, MCI WorldCom, agreed with Mr. Darcy. The resolution to this Issue would be different if it is discovered that it only applies to PIC'd carrier services.
- Mr. Read commented that we do not know whether the FCC would respond to our letter. The FCC have already given us their final and the industry needs a process in place by April 2000. It is likely that a response from the FCC would not be received by the April date.
- Ms. Edna Grable, BellSouth, advised that there is a NECA filing for this FCC order to be reconsidered.
- Mr. Read is not opposed to sending a letter. However, he would prefer that the committee continue working this Issue in order for the industry to have a process in place by April 2000. Ms. Bell commented that this is a viable solution even though there are outstanding concerns and questions.
- Ms. Cockrell advised that correspondence such as this would have to be approved by the CLC. This was a concern to the committee.
- Mr. Darcy wanted to have the FCC on this conference call to discuss this Issue, but it was too late to make arrangements. Ms. Bell would not agree to having the FCC on a conference

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12/13/99 Full Committee Interim Conference Call (continued)

call due to regulatory issues; her company's legal reps would need to be represent. Ms. Cowart asked whether ATIS would be able to lend some assistance in this matter. Ms. Bell suggested preplanning to have the FCC at an OBF meeting so that participants have the time to advise their Legal Department.

- Ms. Cockrell suggested discussing the alternate proposal before moving forward.
- Ms. Irwin commented that if the committee agrees on the module, we may be agreeing to something that may not be effective. The FCC may think that we have a practical solution when it may not be. Mr. Havens noted that many other companies have the same concern.
- Mr. Grady suggested moving forward with this Issue and opening a new Issue that is titled "*Concerns With Truth In Billing Guidelines*" noting that we have outstanding questions and concerns before we can move forward with Issue 1977.
- The question was asked "*If we wait until OBF 69 to place Issue 1977 into Initial Closure, will we have enough time to place it into Final Closure by April?*" Mr. Grady replied "*Yes – there is a one week leeway before April 1st where we can hold a full committee interim conference call*".
- Mr. Darcy commented that companies will not be able to implement this solution into their systems within the existing two months between the Issue going Final at the February OBF, and the April deadline.
- Ms. Cockrell asked the question "*What if we are not in compliance by April 1st, 2000?*" Mr. Grady stated that the committee must give this our best efforts and then advise the FCC of our concerns and questions.
- Ms. Bell asked whether there is any intention for the OBF to address the FCC in regards to this Issue. Mr. Grady stated he would not be opposed to trying to address some industry concerns that we have with the FCC. Ms. Bell commented that the industry is looking at groups like the OBF to raise these concerns and believes this to be a great idea but would not want to stop work on this Issue until then these concerns are addressed. Ms. Bell would

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prefer that the committee reach consensus on this call on either the module or a record and address an OBF response to the FCC at OBF #69.

- Mr. Darcy suggested placing this Issue into Initial Closure at OBF #69 (February 2000), assign some action items and then holding a conference call to place it into Final Closure. Mr. Darcy commented that he does not believe the module is the solution for this Issue. Much discussion was held regarding the module.
- Ms. Cockrell stated that the committee must move forward with an interim plan; we do not want to delay this further and not have any idea what to do on April 1st. Mr. Darcy agreed. **It was agreed to decide on either a record or module on this conference call.**
- **It was agreed that some companies would move forward based on this Issue going into Initial.** Mr. Darcy again commented that this solution will not work with a one month interval. Ms. Cockrell stated that the committee's goal is attempting to be in compliance with the FCC.
- **Consensus was reached to move forward on this Issue to be in compliance with the FCC knowing that this committee will open a new Issue to discuss other concerns.**
- Mr. Read advised that if we do not place this Issue into Initial Closure on today's call, more concerns will be voiced at OBF #69.

Module or New record?

- Mr. Grady commented that the module would be much easier to implement and allow companies to tack it onto a number of different offerings.
- Mr. Havens asked the question *"Do we have general agreement that if we were to develop this module, this would be something the IXC's have to provide?"* Mr. Grady noted that a module is much more flexible in it's use than a new record would be. Mr. Darcy asked if it is incumbent for the IXC's to be responsible. Mr. Read commented that he is not opposed to developing a module, however, it wasn't his intention to narrow the use of the 39 either. Mr. Grady commented that, from an adaptability perspective, most companies' systems are

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better able to handle modules in the short timeframe. Ms. Cockrell commented that it would be more practical to attach a module to applicable records.

- Ms. Mitchell commented that she does not see anything else is in that module that we need; Ms. Mitchell believes that we only need an indicator not a module. Ms. Bell agreed; why not just add an indicator on all of the Message Exchange records?
- Ms. Mitchell still supported the new 39 record and did not see the value in a module.
- The committee discussed finding a byte to carry the information.
- Billing Concepts still supports the module.
- Ms. Grable commented that a single indicator in the base record would be the best solution, but it would take a considerable amount of time to create the documentation.
- Ms. Mitchell does not want a module that just carries one byte of information.
- Concerns were raised that if more information is needed for Truth In Billing in the future, then a single byte indicator is not flexible enough, whereas new versions of a module can be introduced.
- Mr. Havens suggested adding language to the Issue or documentation which would suggest that before the solution be implemented we would have to have FCC issues identified. The committee would move forward with the information that we have which would show the FCC that the committee is attempting to be in compliance. However, we would not implement the solution until the FCC addresses these concerns. Mr. Read and Ms. Bell both concurred that the FCC may never address our concerns.
- Mr. Grady asked that the committee consider opening a new Issue at OBF #69 and in the meantime, participants should discuss with their Legal Department whether they would support a letter to the FCC or ban together with their own interest groups. Ms. Irwin agreed.
- Ms. Mitchell asked if the module would only be attached when it is a new service provider. Mr. Grady replied "Yes".

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Issue Title: Truth-in-Billing New Service Provider Notification

12/13/99 Full Committee Interim Conference Call (continued)

- **Companies were polled for their solution preference to this Issue: (1) Find space for an Indicator (new indicator or add new value to existing indicator) on each EMI record, (2) a new EMI record (39-10-05) or (3) a module solution?**

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- ☐ SWB – prefers new record; will not object to module if the committee reaches consensus.
- ☐ U S West – would prefer the Indicator over the module.
- ☐ MCI WorldCom – prefers module.
- ☐ Billing Concepts – module (they are much more common now).
- ☐ Bell Atlantic – module.
- ☐ GTE – prefers module, but can live with record.
- ☐ Ameritech – prefers record, but could live with module.
- ☐ U S West – prefers the record.
- ☐ AON – prefers module.
- ☐ USP&C – module.
- ☐ Sprint – abstain.
- ☐ MCI WorldCom – module.
- ☐ AT&T – module.
- ☐ BellSouth – module.
- ☐ Time Warner – module.
- ☐ McLeod USA – abstain (didn't know indicator would be an option).
- Ms. Bell voiced that that the committee agreed at the OBF that this solution would be for non-invoice. Ms. Cockrell commented that she thought that an invoice billing solution would be handled separately and each company would use their own invoice ready billing software for end-user notification. AT&T is not ready for "invoice ready billing" to be impacted by this specific OBF Issue; AT&T will handle it internally. Ms. Bell noted that this OBF Issue is to address a non-invoice billing solution. Mr. Read advised that the order did not state for one or the other; it does not exclude anything Ms. Irwin commented that if the module is placed on the dial around material, there will be loop holes (such as reseller situations).

Part B, Page 14

Issue Title: Truth-in-Billing New Service Provider Notification

12/13/99 Full Committee Interim Conference Call (continued)

- **Consensus was reached to move forward with the creation of a module.**
 - The module proposal emailed to the committee by Mr. Grady was reviewed.
 - **The committee agreed on the following Values for Service Provider:**
 - 1 – new pre-subscribed provider
-

Ordering and Billing Forum Issue Identification Form

Exhibit 3B

OBF Issue Number	1977
Date Submitted	7/19/99
Date Accepted	8/9/99 at OBF # 67
Initial Closure	12/13/99 on Interim CC
Final Closure	at OBF #
Issue Category	Active

Document Name(s): _____

Industry Segment: _____

- 2 – new non-pre-subscribed provider
- 3 – new unspecified provider
- Discussion held on who would be responsible for identifying this information. No conclusions were reached by the committee members.
- It was agreed to leave the local company use space available for now.
- Mr. Read noted that he is content with the module and values defined and would like to see this Issue go into Initial Closure on this conference call.
- Ms. Grable asked if documentation to the ERG is required in order to be placed into Initial. Mr. Grady clarified that if this Issue is to be placed into Initial Closure today, the ERG would need to review the documentation prior to OBF #69.
- **Ms. Trip agreed to schedule an ERG call to review the documentation.**
- **Mr. Darcy suggested that a disclaimer be added to the Issue's resolution. This was agreed to by the full committee.**

Resolution:

The committee reached consensus on the creation of a new Truth-In-Billing module, 020A for a New Service Provider with the following values:

- 1 – new pre-subscribed provider
- 2 – new non-pre-subscribed provider
- 3 – new unspecified provider

Disclaimer:

This solution represents our best attempts at finding a technical resolution to meet Truth-In-Billing New Service Provider requirements at an interim level.

Part B, Page 15

Issue Title: Truth-in-Billing New Service Provider Notification

12/13/99 Full Committee Interim Conference Call (continued)

- * There are many open issues still to be addressed which may require additional Issues to be opened. The industry will seek additional guidelines in satisfying the Truth-In-Billing Service Provider requirements.
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Ordering and Billing Forum Issue Identification Form

Exhibit 3B

OBF Issue Number	1977
Date Submitted	7/19/99
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Issue Category	Active

Document Name(s): _____

Industry Segment: _____

- Mr. Grady advised that if other Issues affect this resolution after final closure, the committee may note this on the resolution statement of those Issues to point to this Issue.
 - **Consensus reached on resolution.**
 - Mr. Grady noted that the order does not put limitations on whose responsible for what. Ms. Irwin asked if the order states that the billing company has the responsibility of the billing text on the bill. Mr. Grady replied "*These are legal issues, not technical issues*". Mr. Read noted that this is in the FCC order.
 - **Mr. Read agreed to provide documentation to Diane Trip and Zina Fitzhenry by tomorrow (12/14/99). Ms. Trip will contact the ERG participants to schedule a conference call to review the documentation prior to OBF #69.**
 - **It was noted that all documentation will be posted with the Issue onto the ATIS Web Site as part of these meeting notes.**
 - **Consensus was reached to place this Issue into *Initial Closure*.**
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